

development, suitable for a range of small A1 to A5 retail uses (with restaurants, cafes and bars being most likely) or B1(c) office uses.

- iii. An 80 bed hotel.
- iv. Car and cycle parking provision to serve the above development, with access off Medway Street.
- v. A pedestrian concourse running diagonally from Medway Street towards the existing riverside park with lanes running towards the waterfront.
- vi. Landscaping appropriate to the urban and riverside setting of this site, incorporating terraces associated with the commercial uses.
- vii. A new riverside walk within the site boundaries.
- viii. Private and semi-private amenity space for apartments on high level roof terraces.
- ix. Refuse collection points and bin stores for both residential and commercial units at strategic locations off the main concourse.
- x. Commercial servicing via Medway Street or from the central concourse

**2.3 It is proposed that the application will be supported by the following information:**

- **Planning supporting statement.**  
This will include the following elements:
  - National planning guidance and local planning policy framework and testing proposed development against advice and policies
  - Assessment of affordable housing provision
  - Assessment of development in context of surrounding built environment
- **Transport Assessment**
- **Travel Plan for residential, commercial and hotel developments**
- **Archaeological Assessment.**
- **Design and Access Statement.**  
This will include the following elements:
  - daylight/sunlight appraisal (shadowing)
  - waste strategy
  - lighting assessment
  - built heritage assessment
  - reference to CABE "Building for Life" criteria
- **Assessment of wind impact (desk top study)**

- Sustainability Report, including utilities capacity.
- Geotechnical and Geo-environmental Interpretative Report
- Winter bird survey
- Report on marine ecology (possibly included within another report)
- Statement of Community Involvement.
- Visual and Landscape Impact Assessments including visual representations from strategic viewpoints  
View-points to be agreed with English Heritage and Medway Council.
- Flood Risk Assessment (including drainage strategy).
- Air Quality Assessment.
- Noise Assessment.
- Tree survey.

### 3.0 Planning context

#### 3.1 The following Central Government guidance is relevant:

- PPS1 – Delivering Sustainable Development.
- PPS3 – Housing
- PPS6 – Planning for Town Centres
- PPS9 – Biodiversity and Geological Conservation.
- PPG13 – Transport.
- PPG16 – Archaeology and Planning.
- PPG24 – Planning and Noise.

This guidance relates to the proposed development of the application site and will be followed in the context of the planning application submission.

#### 3.2 The development plan comprises:

- Medway Local Plan (2003).

The development plan identifies both site specific and general development control policies which impact upon the development potential of this site. These will be examined in the context of the planning supporting statement.

#### 3.3 The site falls within an area already covered by a Master Plan. The following document is therefore also a material consideration:

- Chatham Centre and Waterfront Development Brief (August 2008).

3.4 Other relevant background documents also include:

- Building Height Supplementary Planning Document
- Development Contributions Guide Supplementary Planning Document
- Medway Local Transport Plan
- Safer Places, The Planning System and Crime Prevention
- Secured by Design

3.5 The screening opinion is governed by:

- Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999 – Regulation 5.
- Circular 02/99 – Environmental Impact Assessment (paragraphs 55 to 58).

These are examined in section 4.0.

4.0 Application of criteria to proposed development

4.1 It is first necessary to establish whether or not this is a Schedule 2 development requiring an Environmental Impact Assessment (EIA). Annex A of Circular 02/99 sets out indicative thresholds and criteria for identification of Schedule 2 developments. This proposal is considered to be an "urban development project".

4.2 It is submitted that the proposed development does not fall into the category of being a Schedule 2 development. This is not a proposal for a "shopping centre", *inter alia*, but simply a number of shop units with residential development above.

4.3 Even assuming a "worst case" scenario, and it is a Schedule 2 development, paragraph A18 of Annex A of Circular 02/99 goes on to advise that the following two relevant criteria are important considerations in deciding whether or not an EIA is required. These are:

- i. Physical scale of development.
- ii. Potential increase in traffic, emissions and noise.

4.4 Taking physical scale first, the advice refers to physical elements such as *commercial* floor area (i.e. more than 10,000 sq.m. of new commercial floorspace) or number of *dwellings* (more than 1,000 houses). Neither threshold is relevant in this case as the amount of commercial floorspace is some 4,265 sq.m and some 121 apartments. Paragraph A19 continues that an EIA is likely to be required for development on *sites larger than 5ha*, which is considerably larger than the application site which is only some 0.667 ha.

4.5 Issues such as potential increase in traffic will be fully addressed in the application submission but it must be recognised that this is a town centre site which has already been the subject of a Master Plan.

4.6 Paragraph A19 sets a further test, namely "whether the proposed development would have a more "urbanising" effect in a previously non-urbanised area". The surrounding area is already wholly urban in character being in the heart of Chatham town centre, so this test is met.

5.0 Conclusions

5.1 It is considered that this development does not constitute Schedule 2 Development but, for the avoidance of possible future delays, this screening opinion has been requested.

5.2 Having given full consideration to Central Government guidance, relevant Regulations and Circular 02/99, it is submitted that the proposed development meets all relevant criteria and does not require submission of a full EIA.

5.3 In any event, it is accepted that aspects of the development will need to be the subject of specialist studies and the full list, set out in paragraph 2.3, already effectively comprises the basis of an EIA. These studies will address issues relating to:

Transport	Contamination
Archaeology	Air Quality
Planning	Trees
Design & Access	Community Involvement
Wind	Flood Risk
Ecology	Sustainability Report
Noise	

5.4 I should therefore be grateful for Medway Council's early confirmation that a full EIA is not necessary for this planning application and, notwithstanding the fact that no EIA is required, that the scope of works suggested in paragraph 2.3 has been correctly identified and is comprehensive.

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Patch III